

EXHIBIT 16

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
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6 IN RE: JUUL LABS, INC., MARKETING, Case No.
7 SALES PRACTICES, AND PRODUCTS 19-MD-02913-WHO
8 LIABILITY LITIGATION

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14 VIDEO-RECORDED 30(B)(6) DEPOSITION OF
15 SAN FRANCISCO UNIFIED SCHOOL DISTRICT
16 THROUGH ITS DESIGNEE QUARRY PAK
17 (Via videoconference)
18 Thursday, April 8, 2021
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24 REPORTED BY:
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR
JOB NO. 192051

1 QUARRY PAK,
2 having first been duly sworn by the
3 Certified Shorthand Reporter, testified as
4 follows:
5

6 THE REPORTER: Thank you. Please proceed.
7

8 EXAMINATION

9 BY MR. LEMIEUX:

10 Q. Good morning, Ms. Pak.

11 A. Good morning.

12 Q. Could you state your full name for the
13 record, please.

14 A. Quarry Pak.

15 Q. And are you appearing today, Ms. Pak, as
16 the corporate representative of the San Francisco
17 Unified School District?

18 A. Yes.

19 Q. And are you appearing here today pursuant
20 to the deposition notice that we've served on the
21 San Francisco Unified School District?

22 A. Yes.

23 Q. Ms. Pak, have you had your deposition taken
24 before?

25 A. No.

1 A. She has that information on the youth
2 behavior surveys and the checks, the healthy kid
3 surveys. We all have access to it. It's public
4 health information.

5 Q. Is fair to say she is the keeper of those
6 records?

7 A. Yes.

8 Q. When the school health programs department
9 is putting together health education programs, for
10 example, on tobacco education --

11 A. Yes.

12 Q. -- who is the person who prepares those
13 documents, those educational materials? Would that
14 be you?

15 A. That would be me with the teachers I
16 mentioned before.

17 Q. Would that also be true as for documents or
18 presentation materials concerning vaping?

19 A. Yes.

20 Q. How long have you been preparing
21 educational materials or presentations on vaping in
22 your current position?

23 A. I've been in my current position since
24 2015, so since then.

25 Q. Have you been preparing educational

1 materials on vaping since 2015?

2 A. Yes.

3 Q. And would the same be true for tobacco use?

4 A. Yes. I would say that before that point,
5 because I was working in the schools.

6 Q. Are you also responsible for preparing
7 materials on alcohol use?

8 A. Yes. It's comprehensive education.

9 Q. And would that also include illicit drugs,
10 like marijuana?

11 A. Yes.

12 MR. LEMIEUX: Ms. Wilkerson, if we could
13 bring up the plaintiff's fact sheet, please.

14 Mr. Cutler, I have several versions of this
15 fact sheet, but I believe that they're all the same
16 except that some, because the way they formatted
17 were truncated. So if my understanding is
18 incorrect, I would appreciate you letting me know,
19 but I think they all have the same information.

20 MR. CUTLER: Okay. Thank you.

21 (Deposition Exhibit 9 was marked for
22 identification)

23 BY MR. LEMIEUX:

24 Q. If we can go to just the first page.

25 Ms. Pak, do you recognize this document?